

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ADAMA JAMMEH and OUMIE SALLAH,

Plaintiffs,

v.

HNN ASSOCIATES, LLC, GATEWAY, LLC,
COLUMBIA DEBT RECOVERY, LLC, d/b/a
GENESIS CREDIT MANAGEMENT, LLC, and
WILLIAM WOJDAK,

Defendants.

NO. 2:19-cv-00620-JLR

**STIPULATION AND ORDER REGARDING
SCHEDULING ISSUES**

I. STIPULATION

1. On June 15, 2020, the Court directed HNN to complete its production of documents responsive to Plaintiffs' requests relating to Mr. Wojdak's individual liability within sixty (60) days. Dkt. No. 90 (Tr. at 19:21-20:4).

2. The Court also entered an Order extending the discovery cutoff to June 14, 2021 and extending the trial date to October 5, 2021. Dkt. No. 101.

3. HNN made an initial production of relevant documents on June 22, 2020.

4. The parties met and conferred regarding search terms and the status of production of potentially responsive documents on July 2, 2020. Plaintiffs requested additional search terms which HNN has included within its search and which were discussed during that conference.

5. HNN states it used search terms requested by Plaintiffs to identify potentially responsive emails and after de-duping, identified approximately 21,158 documents amounting to, at minimum, 75,445 pages for review.

6. HNN has been working diligently to obtain, collect, and review for responsiveness and/or privilege records in order to produce them. However, due to the large volume of records, HNN will not be able to complete its review and production of those documents by August 15, 2020 (60 days from the date of the discovery conference with the Court).

7. The parties have cooperatively worked together and agreed that HNN will make a second production of responsive documents on August 14 and will complete its production of responsive documents by August 28, 2020.

8. The parties have agreed that Plaintiffs should have at least 60 days to review the voluminous production before deposing Mr. Wojdak. They have agreed that Mr. Wodjak's deposition and any other depositions necessary to address his individual liability shall be completed not later than October 26, 2020.

9. The parties have agreed the Plaintiffs will file their response to Mr. Wojdak's motion for summary judgment not later than November 20, 2020, and Mr. Wodjak shall file his reply not later than December 11, 2020.

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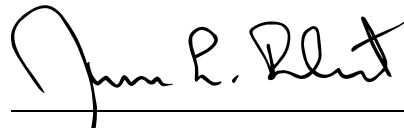
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and William Wojdak*

II. ORDER

10. Based on the foregoing, it is hereby ORDERED that HNN shall complete its production of documents as ordered by the Court during the June 15 hearing no later than August 28, 2020. Plaintiffs shall complete depositions relevant to Mr. Wodjak's individual liability by October 26, 2020. Plaintiffs shall file their response to Mr. Wodjak's motion for summary judgment not later than November 20, 2020, and Mr. Wodjak shall file his reply not later than December 11, 2020. Mr. Wodjak shall re-note his pending motion for summary judgment on individual liability for consideration on December 11, 2020.

IT IS SO ORDERED.

DATED this 13th day of August, 2020.



JAMES L. ROBART
United States District Judge